

REMARKS

Claims 1-45 are pending in the present application. Claims 1, 2, 9, 16, 17, 31-33 and 45 have been amended herewith. Reconsideration of the pending claims is respectfully requested.

Amendments were made to the specification to correct errors and to clarify the specification. No new matter has been added by any of the amendments to the specification.

I. Objection to Specification

The Examiner objected to the Specification because of some missing information regarding status and serial number of a co-pending application that is mentioned therein. Applicants have amended the Specification herewith to include such missing information. Thus, the objection to the Specification has been overcome.

II. Objection to Drawings

The Examiner objected to the Drawings in stating that they fail to show the XSL template match 610 and the embedded child template 620 as described in the Specification on pages 23 and 24. Enclosed are formal drawings which incorporate the changes to Figure 6 to include these changes. Therefore, the objection to the Drawings has been overcome.

III. Objection to Claims

Claims 31 and 33 were objected to by the Examiner based on some minor errors/informalities. Applicants have amended Claims 31 and 33 as suggested by the Examiner. Therefore, the objection to the Claims has been overcome.

IV. 35 U.S.C. § 112, Second Paragraph

The Examiner rejected Claims 2-5, 9-10, 15, 17-20, 25, 30, 32-35, 40 and 45 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. This rejection is respectfully traversed.

Applicants have amended Claims 1 and 2 (and similarly Claims 16, 17, 31 and 32) in an attempt to clarify the different subset style sheets.

Applicants have amended Claim 9 to eliminate the perceived redundancy of the identifying and merging steps.

Applicants have amended Claim 45 as suggested by the Examiner.

Therefore the rejection of Claims 2-5, 9-10, 15, 17-20, 25, 30, 32-35, 40 and 45 under 35 U.S.C. § 112, second paragraph has been overcome.

V. 35 U.S.C. § 103, Obviousness

A. The Examiner rejected Claims 1-9, 11-14, 16-24, 26-29, 31-39 and 41-44 under 35 U.S.C. § 103 as being unpatentable over Helgeson et al. (US Pat No. 6,643,652). This rejection is respectfully traversed.

With respect to Claim 1, Applicants show that the cited reference does not teach or suggest either of the claimed steps recited therein. First, and as expressly acknowledged by the Examiner as not being taught, the cited reference does not teach or suggest the claimed step of “identifying a plurality of subset style sheets based on content of the electronic document”. However, states the Examiner, the fact that the XSL transformation is used to merge the content, logic and style to generate a XML document based on the web content suggests that the style sheet for each portion in the web document content must be identified so that all of the style sheets in the web content, represented by the style sheet’s name or style sheet’s identifier, are recognized to be merged for generating a XML document. Applicants show that, to the contrary, the reference teaches a traditional type of document creation, where an XML file (albeit, a merged XML file) is rendered using an XSL stylesheet to create a document (Helgeson Col. 50, lines 53-67). There is no teaching or suggestion of identifying a plurality of style sheets, as claimed, but rather using a single style sheet as part of a traditional rendering. This claimed feature of identifying a *plurality* of style sheets (based on content of the electronic document) advantageously allows for creating simple style sheets that describe standard subsets of content which can then be combined or merged into a composite style sheet that can then be applied for rendering, presenting, or

transforming a document. The cited reference does not teach or suggest identifying a *plurality* of style sheets as part of generating a composite style sheet, and thus Claim 1 is shown to not be obvious in view of the cited reference. To establish prima facie obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. *See also, In re Royka*, 490 F.2d 580 (C.C.P.A. 1974) (emphasis added by Applicants).

Secondly, the cited reference does not teach or suggest the claimed step of “merging the plurality of subset style sheets to generate the composite style sheet”. In rejecting Claim 1, the Examiner states that the cited reference teaches “merging the content, logic and style separated into different XML files using XSL” (citing Helgeson col. 50, lines 43-67). Applicants show that there, Helgeson states:

“The platform 808 allows content, logic and style to be separated out into different XML files, and uses XSL transformation capabilities to merge them resulting in the automatic creation of HTML through the processing of statically or dynamically generated XML files. The platform 808 can also generate other, non-HTML based forms of XML content, such as XSL:FO rendering to PDF files, client-dependent transformations such as WML-formatting for WAP-enabled devices, or direct XML serving to XML and XSL aware clients.

The platform 808 divides the development of web content into three separate levels: (a) XML creation--The XML file is created by the content owners. They do not require specific knowledge on how the XML content is further processed--they only need to know about the particular chosen "DTD" or tagset for their stage in the process. This layer can be performed by users directly, through normal editors or XML-aware tools/editors; (b) XML processing--The requested XML file is processed and the logic contained in its logicsheet is applied. Unlike other dynamic content generators, the logic is separated from the content file; and (c) XSL rendering--The created document is then rendered by applying an XSL stylesheet to it and formatting it to the specified resource type (HTML, PDF, XML, WML, XHTML, etc.).” (emphasis added by Applicants)

As can be seen, this passage describes the merging of XML files to create HTML. The only mention of a style sheet in this cited passage is with respect to step (c) XSL rendering (Col. 50, line 64-67), where it states “The created document is then rendered by applying an XSL style sheet to it and formatting it to the specified resource type”.

Applicants urge that this passage (1) teaches merging of XML files (and not merging of style sheets) to create HTML, and (2) the traditional use of a single XSL style sheet to render a document. There is simply no teaching or suggestion of any type of merge operation that merges a plurality of style sheets to generate a composite style sheet. Thus, Claim 1 is further shown to not be obvious in view of the cited reference as there is yet another missing claimed element not taught or suggested by the cited reference.

Applicants initially traverse the rejection of dependent Claims 2-9 and 11-14 for reasons given above regarding independent Claim 1.

Further with respect to Claim 2, Applicants show that the cited reference does not teach or suggest the claimed feature of “wherein the plurality of subset style sheets includes a global style sheet and other subset style sheets, and wherein merging the plurality of subset style sheets includes inserting the other subset style sheets into the global style sheet to generate the composite style sheet”. In rejecting Claim 2, the Examiner cites Col. 71 and 72 of the cited reference as teaching this claimed feature. Applicants show that this passage merely shows the existence of a single style sheet (note the beginning stylesheet tag on line 2 of the code listing, and the ending stylesheet tag on the last line of the code listing). However, this merely shows the existence of a single style sheet and does not teach or suggest *how it was generated*. Claim 2 expressly recites specific steps used in a composite style sheet generation, and also lists other style sheets being used as a part of such composite style sheet generation (global style sheet and a plurality of subset style sheets). It is respectfully urged that the mere teaching of a single style sheet does not teach any steps of *how* such style sheet was generated, and in addition, the teaching of a single style sheet does not teach (i) a composite style sheet, (ii) a global style sheet, and (iii) a plurality of subset style sheets. Thus, Claim 2 is further shown to not be obvious in view of the cited reference, as there are claimed features and steps not taught or suggested by the cited reference.

Applicants further traverse the rejection of Claim 3 for reasons given above regarding Claim 2 (of which Claim 3 depends upon).

Applicants further traverse the rejection of Claim 3 by showing that the cited reference does not teach or suggest the claimed step of “converting a root template in each of the other subset style sheets to a child template”. In rejecting Claim 3, the

Examiner cites Col. 73 and 74 of the cited reference, and in particular the xml:import tags. Applicants show that this cited passage discusses use of a stylesheet as part of rendering the document (see, for example, Col. 73, lines 22-23 where it states “Line 4 displays the title of the page by accessing the wdk:title tag the wdk:head tag”). Thus, this cited passage discusses *use* of a style sheet when rendering a document. In contrast, Claim 3 is directed to specific steps performed to *generate* a style sheet. The cited reference does not teach or suggest any type of root template conversion as part of style sheet generation. Even assuming arguendo that the Examiner’s discussion of a hierarchical relationship with importing of child templates is accurate, such import occurs during document rendering and not during style sheet generation. Thus, Claim 3 is further shown to not be obvious in view of the cited reference.

Applicants further traverse the rejection of Claim 4 for reasons given above regarding Claim 3 (of which Claim 4 depends upon).

Applicants further traverse the rejection of Claim 5 for reasons given above regarding Claim 2 (of which Claim 5 depends upon).

Applicants further traverse the rejection of Claim 6 by showing that the cited reference does not teach or suggest the claimed feature of “wherein identifying a plurality of subset style sheets includes parsing the electronic document into a document object model and examining first level child elements of the document object model”. The Examiner cites Col. 56, lines 49-50 and Col. 57, lines 25-67 as teaching this claimed feature. Applicants acknowledge that the cited passage mentions parsing a model file to create a DOM representation of the XML document. However, that is where the similarities end. As to this DOM representation, the cited passage discusses inserting instructions into this DOM model (Col. 57, lines 30-40), and updating hyper links in the model (Col. 57, lines 41-42). The model is then returned and processed by the WSeB Content Server 800 (Col. 57, lines 43-45). There is simply no teaching or suggestion of *examining first level child elements of the model as part of identifying a plurality of subset style sheets*, as claimed. Thus, Claim 6 is further shown to not be obvious in view of the cited references.

Applicants further traverse the rejection of Claim 7 for reasons given above regarding Claim 6 (of which Claim 7 depends upon).

With respect to Claim 9, Applicants have amended such claim in response to a 35 USC 112, second paragraph rejection. Applicant show that the cited reference does not teach or suggest conditional generation of a composite style sheet as determined by whether the style sheet is present in a style sheet repository. Applicants further traverse the rejection of Claim 9 for similar reasons to those given above regarding Claim 1, and show that the cited reference does not teach or suggest either the identifying or merging steps as a part of the composite style sheet generation. Thus, Claim 9 is shown to not be obvious in view of the cited reference, as there are numerous missing claimed steps not taught or suggested by the cited reference.

Further with respect to Claim 11, Applicants show that the cited reference does not teach or suggest the claimed step of “determining if a client device to which the electronic document is to be sent is capable of rendering the electronic document using the composite style sheet, and sending the electronic document to the client device *with a reference to the composite style sheet*”. The passage cited by the Examiner in rejecting Claim 11 merely discusses the ability to create different forms of XML content that can be sent to different types of clients. This ability to support multiple formats does not teach or suggest sending the document to the device *with a reference to the (generated) composite style sheet*. Nor does such ability to support multiple formats teach or suggest any determination of *whether the device* is capable of rendering the document *using the composite style sheet*. At best, the reference suggests that a determination is made as to what types of *XML content* to rendered, but does not teach or otherwise suggest determining what type of *style sheet* can be used by such devices. XML content and style sheets are different (see, for example, Applicants’ Figure 3), and the teaching of one’s (XML content) operability with a device does not teach or suggest operability of the other (style sheet) with a device. Thus, Claim 11 is further shown to not be obvious in view of the cited reference.

Applicants further traverse the rejection of Claims 12 and 13 for reasons given above regarding Claim 11 (of which Claims 12 and 13 depend upon).

Applicants further traverse the rejection of Claim 14 by showing that the cited reference does not teach or suggest the claimed feature of “wherein identifying a plurality of subset style sheets further includes identifying the plurality of subset style sheets based

on characteristics of a client device to which the electronic document is to be sent”. The Examiner references various Figures in the cited reference, as well as specific citations to Col. 50, lines 47-52, Col. 51, lines 31-37 and Col. 135, lines 8-27 of the cited reference. As to the referenced figures, Applicants show that Figure 4 shows a high level architectural block diagram, and does not teach or otherwise suggest any operational steps being performed, such as identifying subset style sheets. Similarly, Figure 17 does not teach or otherwise suggest any operational step of identifying subset style sheets. As to the reference to Col. 50 of the cited reference, such passage merely discusses the ability to generate other non-HTML forms of XML content but does not in any way discuss any type of identification of a plurality of style sheets to be used in generating a composite style sheet, or that identification of style sheets used to generate a composite style sheet is based on characteristics of the device. As to the reference to Col. 51 of the cited reference, while this passage discusses building a single style sheet, including adding XSLT tags to the stylesheet, it does not teach any identification of a plurality of style sheets used to generate a composite style sheet. And since it does not teach or suggest identifying a plurality of style sheets, it necessarily doesn’t teach that such identifying (which is missing from the teachings of the cited reference) is based upon characteristics of a device, as claimed. Finally, with respect to the cited passage at Col. 135 of the cited reference, this passage discusses actual rendering of a document. While it does mention that the generated interface that is generated is dictated by a set of style sheets generated in Interface Server 1721, there is no teaching or suggestion of how these style sheets are actually generated, and certainly does not teach or suggest generation of a composite style sheet by identifying a plurality of subset style sheets based on characteristics of a device to which the document is to be sent. At best, it states that the generated interface is dictated by the style sheet used, but makes no mention of *how* such style sheet is generated, such as identifying subset style sheets based on characteristics of the device, and then generating a composite style sheet from such identified subset style sheets. Thus, Claim 14 is further shown to not be obvious in view of the cited reference.

Applicants traverse the rejection of Claim 16 and 31 for similar reasons to those given above regarding Claim 1.

Applicants traverse the rejection of Claim 17 and 32 for similar reasons to those given above regarding Claim 2.

Applicants traverse the rejection of Claim 18 and 33 for similar reasons to those given above regarding Claim 3.

Applicants traverse the rejection of Claim 19 and 34 for similar reasons to those given above regarding Claim 4.

Applicants traverse the rejection of Claim 20 and 35 for similar reasons to those given above regarding Claim 5.

Applicants traverse the rejection of Claim 21 and 36 for similar reasons to those given above regarding Claim 6.

Applicants traverse the rejection of Claim 22 and 37 for similar reasons to those given above regarding Claim 7.

Applicants traverse the rejection of Claim 23 and 38 for similar reasons to those given above regarding Claim 8.

Applicants traverse the rejection of Claim 24 and 39 for similar reasons to those given above regarding Claim 9.

Applicants traverse the rejection of Claim 26 and 41 for similar reasons to those given above regarding Claim 11.

Applicants traverse the rejection of Claim 27 and 42 for similar reasons to those given above regarding Claim 12.

Applicants traverse the rejection of Claim 28 and 43 for similar reasons to those given above regarding Claim 13.

Applicants traverse the rejection of Claim 29 and 44 for similar reasons to those given above regarding Claim 14.

Therefore, the rejection of Claims 1-9, 11-14, 16-24, 26-29, 31-39 and 41-44 under 35 U.S.C. § 103 has been overcome.

B. The Examiner rejected Claims 10, 25 and 40 under 35 U.S.C. § 103 as being unpatentable over Helgeson as applied to Claims 1, 16 and 31 above, and further in view of Renard et al. (US Pat No. 6,405,123). This rejection is respectfully traversed for similar reasons to those given above regarding Claims 1 and 2.

Therefore, the rejection of Claims 10, 25 and 40 under 35 U.S.C. § 103 has been overcome.

C. The Examiner rejected Claims 15, 30 and 45 under 35 U.S.C. § 103 as being unpatentable over Helgeson as applied to claims 1, 16 and 31 above, and further in view of W3C, XSL Transformations (XSLT) Version 1.0, 11/16/99, pages 1-123. This rejection is respectfully traversed.

This rejection is initially traversed for similar reasons to those given above regarding Claims 1 and 2.

Further with respect to Claim 15 (and similarly for Claims 30 and 45), such claim recites “wherein the global style sheet includes a prefix/postfix glue that generates cards from the merged subset style sheets”. The passage cited by the Examiner in the W3C reference is merely a syntax summary (see page 104), and does not teach any particular or specific use of the prefix syntax that is described – and specifically it does not teach or suggest that this prefix syntax is used in any way *to generate cards from merged subset style sheets*, as claimed. Rather, it appears to merely define a namespace alias on page 106, the setting of parameters to a token on page 108, and that XSL: is used as a prefix as part of the syntax notation. None of these passages discuss any operational ability to generate cards from merged subset style sheets, as claimed. Therefore, Claim 15 is further shown to have been erroneously rejected under 35 U.S.C. § 103.

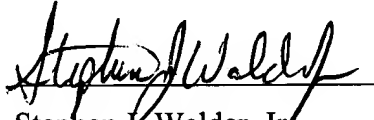
Therefore, the rejection of Claims 15, 30 and 45 under 35 U.S.C. § 103 has been overcome.

VI. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: May 17, 2004

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen J. Walder, Jr.", written over a horizontal line.

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